
From: Stanfield, Brooks
Sent: Thursday, January 26, 2017 2:42 PM
To: Fowlow, Jeffrey
Subject: Treoil - Starter pack of documents
Attachments: EPA START Treoil Summary 2015.pdf; Treoil Whatcom Co II FIELD ERTS 648824 6-2014.pdf; Whatcom ERTS 2014 1.JPG; Whatcom ERTS 2014 2.JPG; Ecology HW Inspection Report Sept 2014.pdf; Treoil_Photo Log_Jan 14 2015.pdf; Treoil_Photo Log2_Jan 14 2015.pdf

Jeff-

We should probably go over these before the Feb 6th meeting with Ecology regarding the Treoil Industries. But I wanted to give you a quick timeline and some of the most recent inspection documents to get a feel for the issues at this site. You can either browse this stuff or we can go through it together. Let me know if you have a preferred day next week to meet.

Here's what I know:

The site has had compliance issues going back to the late 80s. In 2000 Jeff Rodin conducted a Removal Site Evaluation. Although there were numerous issues at that time Jeff determined that a threat of discharge of oil was low in spite of the fact that owners were penalized by WDOE for a "discharge of spilled material to a drainage ditch that eventually leads to the Strait of Georgia." Part of this may have been because what was believed to be in the biggest tanks was "rosin solids" (kind of a peanut buttery residual).

Ecology started getting interested in the site again around 2006 when one of the incarnations of the owners energy business began pursuing permits. Inspections showed numerous compliance issues, many familiar to the site.

In 2014 the reports begin to ramp up again. An ERTS complaint led to a County Health inspection in June followed by an Ecology Haz Waste program inspection in September. These reports document conditions that can only be described as "out of control." Lots of uncontrolled storage of hazardous chemicals, evidence of spills to soil, numerous totes/drums/containers with unknown liquids and no secondary containment, reports of oil covering soil throughout the site, and flow of oil with stormwater conveyance systems to locations potentially off site. Sampling found PAHs, diesel/heavy oils, lead, and organics in various water and soil samples.

In 2015 several Ecology inspections occurred. It was documented that many of the mismanaged chemicals had been transferred to another facility. Investigation of the substance described as tall oil that was found in numerous totes and random containers found that it had various fractions with heavy stuff on the bottom and lighter fractions floating on top. Bioassay test of tall oil showed that it qualified as a state "dangerous waste" but not an "extremely hazardous waste" the latter of which I think corresponds with a RCRA haz waste. Many/all of the totes were moved under cover; many still don't appear to have secondary containment. It was also during this period we have some photos of secondary containment around big tanks with at least a foot of water and product floating on top. Apparently the owner reported having pumped this out, skimmed off the oil and discharged the water to bare ground without testing first. One of the photo logs attached shows the drainage on site that leads to the creek we scoped out last week. Ecology issued their order in September 2015.

Attached are a few things:

- A 3-page summary Renee completed for me in 2015 when we first began discussing this with Ecology.
- Whatcom County ERTS inspection from 2014 plus two photos of secondary containment.

- Ecology's Haz Waste Program Inspection Report that followed the ERTS inspection late in 2014. I believe many chemicals have been removed since this was done, but liquid wastes, containers, and spill management concerns may not have been addressed.
- Two Photo logs with good notes of an Ecology site visit in Jan 2015.

This should get you a decent picture of things. The first questions is, of course, what has happened there in the last two years?

Let's talk about if there is a day next week to go over this.

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